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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 NEBYOU SOLOMON, an individual,
 10 Plaintiff,

11 vs.

12 LAS VEGAS METROPOLITAN POLICE
 13 DEPARTMENT; JOSEPH LOMBARDO,
 14 individually and in his official capacity as
 Sheriff; JOHN L. PELLETIER, an
 15 individual; RICHARD E. MAUPIN, an
 individual; RYAN J. FRYMAN, an
 16 individual; JUAN D. CONTRERAS, an
 individual; ALLEN J. PAVESE, an
 17 individual; BRANDON M. MEADS, an
 individual; FASHION SHOW MALL, LLC,
 18 a Nevada limited-liability company;
 UNIVERSAL PROTECTION SERVICE,
 19 LLC, a Nevada limited-liability company;
 ANDREW ANTONIO, an individual,
 20 EDWARDO AGUILAR, an individual,
 DOES I – V, individuals,
 21 Defendants.

22 Case. No.: 2:19-cv-00652-JAD-DJA

**JOINT MOTION TO EXTEND THE
 DEADLINE FOR:**

- 1) **PLAINTIFF'S RESPONSE TO
 DEFENDANT UNIVERSAL
 PROTECTION SERVICE, LLC'S
 MOTION TO DISMISS
 PLAINTIFF'S THIRD
 AMENDED COMPLAINT (ECF
 No. 62) (FOURTH REQUEST)**
 and;
- 2) **PLAINTIFF'S RESPONSE TO
 FASHION SHOW MALL, LLC'S
 MOTION TO DISMISS
 PLAINTIFF'S THIRD
 AMENDED COMPLAINT (ECF
 No. 71) (THIRD REQUEST)**

23 ECF Nos. 81, 82

24 Pursuant to Local Rule 7-1(c), Plaintiff NEBYOU SOLOMON, Defendant
 25 UNIVERSAL PROTECTION SERVICE, LLC, and Defendant FASHION SHOW MALL,
 26 LLC, by and through their respective counsel, hereby move and request that this Court extend
 27 the deadline to file the following:

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1 1) Plaintiff's Response to Defendant Universal Protection Service, LLC's
2 Motion to Dismiss Plaintiff's Third Amended Complaint (ECF No. 62), filed on April 7,
3 2020, by an additional 28 days, extending the deadline from July 2, 2020 to July 30, 2020.
4 This is the fourth request for an extension of time for Plaintiff to file his Response.

5 2) Plaintiff's Response to Fashion Show Mall, LLC's Motion to Dismiss Third
6 Amended Complaint (ECF No. 71), filed on April 21, 2020, by an additional 28 days,
7 extending the deadline from July 2, 2020 to July 30, 2020. This is the third request for an
8 extension of time for Plaintiff to file his Response.

9 These requests for an extension of time are not sought for any improper purpose or
10 other purpose of delay. These requests are based upon the following:

11 Plaintiff and Defendants Universal Protection Service, LLC and Fashion Show
12 Mall, LLC are actively engaged in settlement discussions. A draft settlement agreement has
13 recently been circulated, which requires review by the parties and their counsel.

14 THEREFORE, the parties respectfully request that this Court extend the deadline
15 to file Plaintiff's Responses to 1) Defendant Universal Protection Service, LLC's Motion to
16 Dismiss Plaintiff's Third Amended Complaint (ECF No. 62) and; 2) Fashion Show Mall,
17 LLC's Motion to Dismiss Third Amended Complaint (ECF No. 71) up to and including July
18 30, 2020.

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1 *Nebyou Solomon v. Las Vegas Metropolitan Police Department, et al.*
2 Case No.: 2-19-cv-00652-JAD-DJA

3 **IT IS SO STIPULATED.**

4 DATED this 2nd day of July, 2020.

5 **MCLEITCHIE LAW**

6 */s/ Leo S. Wolpert*

7 Margaret A. McLetchie, NBN 10931
8 Alina M. Shell, NBN 11711
9 Leo S. Wolpert, NBN 12658
10 701 E. Bridger Ave., Suite 520
11 Las Vegas, NV 89101
12 *Attorneys of Plaintiff Nebyou Solomon*

5 DATED this 2nd day of July, 2020.

6 **WEINBERG, WHEELER, HEDGINS,
7 GUNN & DIAL, LLC**

8 */s/ Jeremy R. Alberts*

9 Jeremy R. Alberts, NBN 10497
10 6385 South Rainbow Blvd., Suite 400
11 Las Vegas, Nevada 89118
12 *Attorneys for Defendant
13 Universal Protection Service LLC*

14 DATED this 2nd day of July, 2020.

15 **KAEMPFER CROWELL**

16 */s/ Bryan M. Viellion*

17 Anthony J. Celeste, NBN 8776
18 Bryan M. Viellion, NBN 13607
19 1980 Festival Plaza Dr., Suite 650
Las Vegas, Nevada 89135
20 *Attorneys of Defendant Fashion Show Mall LLC*

21 **ORDER**

22 **IT IS SO ORDERED.**

23 
24 HONORABLE JUDGE JENNIFER A. DORSEY
25 U.S. DISTRICT COURT JUDGE

26 7-2-2020

27 DATED: _____